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"Award Winning Water"

March 24, 2025

Ms. Rachel Wilcox
Compliance Analyst
Water Division/Enforcement Branch
Division of Environmental Quality
5301 Northshore Dr.
North Little Rock, Arkansas 72118

RE: NPDES Permit No. AR0021768, AFIN 58-00105

Dear Ms. Wilcox:

This letter shall serve as the noncompliance report (NCR) for February 2025 as required by NPDES permit AR0021768.

During this reporting period City Corporation experienced permit violations for the following parameters:

1. Solids, Total Suspended – Mon. Avg. Loading
2. Solids, Total Suspended – 7-Day Avg. Max
3. Solids, Total Suspended – Mon. Avg. Con.
4. Peracetic Acid – Instant. Max.
5. Coliform, Fecal General – Mon. Avg. (Geo Mean)
6. Coliform, Fecal General – 7-Day Avg. (Geo Mean)
7. BOD, Carbonaceous (5-day) – Mon. Avg. Con.

The above violations were caused by the following events at the Pollution Control Works (PCW) during this reporting period.

Between January 29th and February 12th, we received 6.6 inches of rain. We were experiencing high sludge blankets with poor settling characteristics in our three final clarifiers. The wasting pump for Final Clarifier 2 was removed for repair on January 16, forcing us to rely on two wasting pumps to do the work of three.

TSS violations were a result of the biomass in the clarifiers washing out during the higher plant flows, which resulted from the substantial rain events. Fecal coliform violations were the result of excessively turbid water using up the available PAA prior to an adequate detention time. The Instantaneous PAA violation resulted from a higher dosing rate to off-set high solids concentration, and then the sudden decrease in solids at the time of collection. The 5-day CBOD violation resulted from the multiple days of high TSS.

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After an unsuccessful attempt to get the sludge to settle by adjusting the SRT, it was determined through gram-staining, that poor settling of sludge was the result of filamentous bacteria. Multiple rounds of treating with sodium hypochlorite was started, in conjunction with reducing the mixing speed in the anaerobic selector. This showed to have a positive effect on the settling into the month of March, and our SVI has gone from 220 in mid-February to 130, currently. Our preferred SVI range is 90 – 120. The re-installation of the repaired wasting pump on March 12 has helped considerably in getting the sludge blankets in all three final clarifiers to the proper operating depths, improving clarifier capacity by as much as 65%. As temperatures have warmed and plant conditions have improved, the overall quality of our effluent has improved substantially as well. We will continue to make efforts to troubleshoot biomass issues and bring the PCW back into compliance.

In addition to the measures mentioned above, we are working with Hawkins Weir engineering on the final design of a \$1.5 million project to improve our ability to utilize our existing stormwater basins during heavy rainfall events and better prevent surges through the plant. The project includes piping and SCADA improvements that will greatly enhance our ability to gravity and/or pump to our basins as well as drain the basins. Implementation of these controls will allow us to maximize the use of our existing basins by setting a desired plant flow and automatically pump/drain to and from the basins based on that set flowrate. We expect the project to bid in April/May of this year with construction complete late 2025.

Should you have any questions or need other info please contact Greg Kremers, Wastewater Operations Director at 479-968-2080 ext. 236.

Sincerely,

Steve Mallett
Chief Executive Officer